

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JENNIFER RAE GEORGE,
An Incapacitated Person, by
RAYMOND G. GEORGE and
SUSAN M. GEORGE,
Guardians,
Plaintiffs

v.

CITY OF ERIE,
JOYCE SAVACCHIO,
PAUL DEDIONISIO,
RICHARD SZYCHOWSKI,
DAVID VAN BUSKIRK,
RICHARD CRAWFORD,
PATRICK DURKIN,
GREGORY T. DILORETO and
JOHN DOE,
Defendants

No. CA 04 – 77 E

TRIAL BY JURY OF TWELVE (12)
JURORS DEMANDED

PLAINTIFFS' APPENDIX OF EXHIBITS IN RESPONSE TO DEFENDANTS'
CONCISE STATEMENT OF MATERIAL FACTS AND IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Exhibit "A" – June 19, 1999 Memorandum from Erie Police Bureau Patrolman Robert W. Hill,
regarding Gregory DiLoreto's June 17, 1999, motor vehicle operation incident

Exhibit "B" – December 9, 1999, Memorandum from Erie Police Bureau Captain D. Van
Buskirk, making reference to Gregory DiLoreto's June, 1999, discipline following the above

motor vehicle operation incident, and describing same as a “reckless operation of Bureau equipment.”

Exhibit “C” – Eight pages of Erie Police Bureau documents relating to a Citizen Complaint and subsequent investigation involving DiLoretos’ misuse of his police vehicle to harass a civilian motorist, Jeffrey C. Russell, on June 8, 1999.

Exhibit “D” – Twenty-eight pages of Erie Police Bureau documents relating to a Citizen Complaint and subsequent investigation involving DiLoreto’s misuse of his police vehicle to harass a civilian motorist, Nicole Aggelakos, on September 1, 2001.

Exhibit “E” – Transcript of Deposition of John Benedict, relating DiLoreto’s reputation for dangerous driving habits.]

Exhibit “F” – Transcript of Deposition of Donald Marofsky, relating DiLoreto’s reputation for dangerous driving habits and personal observations of same.

Exhibit “G” - Transcript of Traffic Court Proceeding, September 27, 2001.

Exhibit “H” - Transcript of Summary Appeal Hearing, January 31, 2002.

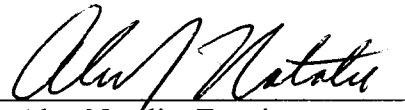
Exhibit “I” - Affidavit and Expert Report of James D. Madden, P.E.

Exhibit "J" - Police Criminal Complaint, *Commonwealth vs. John Marion Butler*, filed by then Officer Gregory DiLoreto on July 21, 2001.

Exhibit "K" - Affidavit and Expert Report of Geoffrey P. Alpert, Ph.D.

Respectfully submitted,

By

A handwritten signature in cursive script, appearing to read "Alan Natalie", is written over a horizontal line.

Alan Natalie, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of the foregoing Plaintiffs' Appendix of Exhibits to the following listed below this 22nd day of July, 2005, by United States first class mail, postage prepaid:

Scott Dunlope, Esquire
Suite 2900, 600 Grant Street
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Respectfully submitted,

By 
Alan Natalie, Esquire
Attorney for Plaintiffs